

Intelligence Agency, the Department of Homeland Security, the National Security Agency/Central Security Service, the Office of the Director of National Intelligence, United States Immigration and Customs Enforcement, and United States Customs and Border Protection (together, the “Executive Agency Subpoenaed Non-Parties”) (the Massachusetts Subpoenaed Non-Parties and the Executive Agency Subpoenaed Non-Parties together, the “Subpoenaed Non-Parties”).

2. The Subpoenaed Non-Parties have objected to the production of documents in response to the Subpoenas on the grounds, inter alia, that certain responsive documents affect the privacy rights of individuals and/or the confidentiality needs of law enforcement. In view of these concerns, the Subpoenaed Non-Parties have agreed to produce documents responsive to the Subpoenas only upon the entry of a stipulated protective order. The stipulated protective orders will therefore facilitate the exchange of information during discovery.

3. The Plaintiff, Defendants, and the Massachusetts Subpoenaed Non-Parties have agreed to the terms of the Stipulated and [Proposed] Protective Order Regarding Documents Produced by Massachusetts Law Enforcement Entities attached hereto as **Exhibit A**.

4. The Plaintiff, Defendants, and the Executive Agency Subpoenaed Non-Parties have agreed to the terms of the Stipulated and [Proposed] Protective Order Regarding Documents Produced by Executive Branch Agencies attached hereto as **Exhibit B**.

5. The Subpoenaed Non-Parties have all agreed to and acknowledged the enforcement of the attached stipulated protective orders in this judicial district.

6. The Parties therefore request the entry of the attached stipulated protective orders.

WHEREFORE, the Parties respectfully request that the Court enter the stipulated protective orders attached hereto as Exhibits A and B.

Respectfully submitted,

Counsel for Plaintiff,

Counsel for Defendants,

/s/ Peter J. Haley

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Dated: May 29, 2015

LOCAL RULE 7.1(A)(2) CERTIFICATION

The Parties are filing this Motion jointly.

/s/ Zachary C. Kleinsasser

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants identified on the Notice of Electronic Filing on May 29, 2015.

/s/ Zachary C. Kleinsasser